

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
v.	)	
	)	NO. 07 C 1139
MILLENNIUM CONSTRUCTION DEVELOP-	)	
MENT, LLC, a limited liability company, a/k/a	)	JUDGE DAVID H. COAR
MILLENNIUM CONSTRUCTION, LLC,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT, JUDGMENT  
AND FOR AN ORDER DIRECTING DEFENDANT TO TURN  
OVER MONTHLY FRINGE BENEFIT CONTRIBUTION REPORTS**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, MILLENNIUM CONSTRUCTION DEVELOPMENT, LLC, a limited liability company, a/k/a MILLENNIUM CONSTRUCTION, LLC., in the total amount of \$35,263.63, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$953.75.

Further, Plaintiffs move for entry of an order directing MILLENNIUM CONSTRUCTION DEVELOPMENT, LLC, a limited liability company, a/k/a MILLENNIUM CONSTRUCTION, LLC., Defendant herein, to turn over monthly fringe benefit contribution reports due for the months of February 2007 through the present date, pursuant to the Agreements and Declarations of Trust to which Defendant is bound, said Defendant having failed to answer or otherwise plead to the Complaint and the monthly contribution reports being required in order to fully liquidate Plaintiffs' claims.

On April 3, 2007, the Summons and Complaint was served on Manager Raymond Mateševac, by tendering a copy of said documents to him at his place of business (a copy of the Summons and Affidavit of Service-Corporate is attached hereto). Therefore, Defendant's answer was due on April 23, 2007. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon  
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### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 26th day of April 2007:

Mr. Raymond Matesevac, Manager  
Millennium Construction Development, LLC  
1536 Muirfield Drive  
Dyer, IN 46311

/s/ Cecilia M. Scanlon \_\_\_\_\_

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